



TANANA CHIEFS CONFERENCE

Health Services
201 First Ave
Fairbanks, AK 99701
(907) 452-8251

Record Center
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
Washington, DC 20590

June 24, 2009

Re: SP 14860-N

Dear Director Billings,

The proposed regulation on air shipment of oxygen cylinders [49 CFR, Part 173.302(f)] will place an exorbitant expense and logistical challenge on Tanana Chiefs Conference (TCC) and air taxi services utilized to transport medical oxygen to our remote village clinics. While TCC appreciates the concern for flight safety of air passengers, the current practice of transporting tanks with compressed gases along with passengers has not once resulted in a negative outcome in the 40 years of operation of rural health clinics in the Interior of Alaska. On the other hand, the consequence from a lack of medical oxygen when needed, could have a significant adverse outcome for many of our patients.

The TCC service area is approximately the size of the state of Texas. We provide medical supplies and equipment to 22 rural village clinics. All but 6 sites depend on air traffic for goods and services including the receipt of compressed medical oxygen. Due to the logistics of supplying goods to rural village clinics and the extreme geographic challenges we face, we must have ready access to exchange empty for full oxygen tanks quickly. The new container requirements unnecessarily restrict the entities involved from being able to easily perform this service on any given flight.

For these reasons, I respectfully urge you to approve Special Permit application 14860-N to "authorize the transportation in commerce of cylinders of compressed oxygen and oxidizing gases without rigid outer packaging when no other means of transportation exist (modes 4.5)."

Sincerely,

TANANA CHIEFS CONFERENCE

Victor Joseph Acting for
Victor Joseph, Health Director

CC: Theodore L. Willke, PhD, Office of Hazardous Materials Safety
Diane LaVelle, Office of Hazardous Materials Safety

Our Vision

~Healthy People Across Generations~

Our Mission

~TCC Health Services, in partnership with those we serve, promotes and enhances spiritual, physical, mental and emotional wellness through education, prevention and the delivery of quality services.~